

NATASHA C., a minor, individually, and by her father, GERALD C., and GERALD C., individually	:	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA
Plaintiffs,	:	
v.	:	
VISIONQUEST, LTD., VISIONQUEST NATIONAL, LTD., VISIONQUEST LODGEMAKERS, INC., VISIONQUEST NONPROFIT CORPORATION, and DARRELL STEACH, an individual and in his official capacity as an employee of VisionQuest.	:	No. 03-1903
Defendants.	:	JURY TRIAL DEMANDED

PLAINTIFFS' SUPPLEMENTAL PRETRIAL MEMORANDUM

PLAINTIFF'S TRIAL EXHIBITS:

- P1. Indiana County Court of Common Pleas Order dated September 25, 2000.
- P2. Purchase of Service Agreement between Indiana County Children & Youth Services and VisionQuest
- P3. VisionQuest employee records for Darrel Steach
- P4. VisionQuest employee records for Robbie Wilson
- P5-A through P5-TT VisionQuest Nightwatch Logs
- P6 VisionQuest Policies and Procedures
 - P6-A. VisionQuest Administrative Policies and Procedures Manual
 - P6-B. VisionQuest Human Resources Policies and Procedures Manual
 - P6-C. VisionQuest Residential Facilities Policies and Procedures
 - P6-D. VisionQuest Quality of Care Manual
- P7. VisionQuest Nightwatch Policy
- P8. VisionQuest Mission Statement

P9. VisionQuest Employee Handbook

P10. VisionQuest Investigation Files for Prior Incidents of Sexual Assault

P10-A. Records relating to Former Employee Robbie Wilson

P10-B. Records relating to Former Employee David Chandler

P10-C. Records relating to Former Employee Darian Gray

P10-D. Records relating to Former Employee Eric Robertson

P10-E. Records relating to Former Employee Kedrick Miles

P11. Summaries of Sexual Assault incidents (prepared by VisionQuest)

P12. Pennsylvania State Police Report, Incident No. H3-1194229

P13. Guilty Plea Colloquy of Darrel Steach

P14. Pennsylvania Dept. of Public Welfare Regulations – 55 Pa. Code §§3800.01, et seq.

P15. VisionQuest Admission Documents for Natasha C.

P16. VisionQuest Centering Plan for Natasha C.

P17. VisionQuest Progress Reviews for Natasha C.

P17-A. Progress review dated November 2000

P17-B. Progress review dated December 2000

P17-C. Progress review dated February 2001

P17-D. Progress review dated March 2001

P17-E. Centering Progress Review dated May 2001

P17-F. Discharge Assessment

P18. VisionQuest Psychological evaluations and reports concerning Natasha C.

P19. VisionQuest Psychiatric evaluations and reports concerning Natasha C.

P20. Report and Curriculum Vitae of Dr. Della Grossman

P21. Report and Curriculum Vitae of Michael Nunno, DSW

P22. Plaintiffs' Request for Admissions directed to Defendant Darrel Steach

P23. VisionQuest Grievance Form dated 02/01/01 and submitted by Natasha C.

P24. VisionQuest "Career Development Staffing Needs" dated 10/24/00

- P25. VisionQuest Education Records for Natasha C.
- P26. VisionQuest Consolidated Financial Statements Years ended June 30, 2001; June 30, 2002; and June 30, 2003.

HOLSINGER, CLARK & ARMSTRONG

By: /s/ Samuel H. Clark

Samuel H. Clark
832 Philadelphia Street
Indiana, PA 15701

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v.	:	No. 03-1903
VISIONQUEST, LTD., VISIONQUEST NATIONAL, LTD., VISIONQUEST	:	
LODGEMAKERS, INC.,	:	
VISIONQUEST NONPROFIT	:	
CORPORATION, and DARRELL	:	
STEACH, an individual and in his official capacity as an employee of VisionQuest.	:	JURY TRIAL DEMANDED
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Plaintiffs' Supplemental Pretrial Memorandum was served upon Defendants Counsel identified below via facsimile on this the 4th day of July, 2004.

Jonathan D. Herbst, Esquire
Margolis Edelstein
The Curtis Center, 4th Floor
Independence Square West
Philadelphia, PA 19106-3304
Fax: (215) 922-1772

/s/ Samuel H. Clark
Samuel H. Clark